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*Attorneys for Defendant  
LinkedIn Corporation*

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION  
13

14 3taps, Inc.,

15 Plaintiff,

16 vs.

17 LinkedIn Corporation,

18 Defendant.  
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Case No. 18-cv-00855-EMC

**DECLARATION OF SCOTT ROBERTS**

1 I, Scott Roberts, declare as follows:

2 1. I am the Vice President and Global Head of Business Development at LinkedIn  
3 Corporation. (“LinkedIn”). My responsibilities focus on business development, including  
4 structuring and creating partnerships that extend value to LinkedIn’s members and customers;  
5 understanding the business environments in which LinkedIn operates; and making decisions as to  
6 partnership strategy and activities. I have personal knowledge of the facts set forth herein, and if  
7 called upon as a witness, I could testify to them competently under oath.

8 2. On August 24, 2022, I was at a reception in Bryn Mawr, Pennsylvania at the home  
9 of the president of Bryn Mawr College. There were approximately 50 other people in attendance,  
10 and the event was held in the backyard of the President’s home. I was introduced to a man named  
11 Greg Kidd who I had not previously met. We struck up a conversation discussing personal  
12 matters before Mr. Kidd told me that he was involved in litigation with Microsoft. I mentioned  
13 that I worked for LinkedIn and Mr. Kidd then clarified that his litigation was actually with  
14 LinkedIn. He said that he had purchased 10% of hiQ for \$500,000 and referred to himself as the  
15 “bad guy” behind scraping-related lawsuits against LinkedIn. As our conversation continued, Mr.  
16 Kidd freely volunteered to me his interest in verified identification and the use of free access to  
17 data—including LinkedIn data—to enable that verification. During the course of our  
18 conversation, I made clear my roles and responsibilities at LinkedIn.

19 3. Our conversation took place within earshot of dozens of attendees, some of whom  
20 overheard and commented on the conversation. Indeed, at one point another guest at the  
21 reception, who apparently overheard at least some of the conversation, jokingly commented that  
22 Mr. Kidd and I were in a lawsuit with each other. At no point did Mr. Kidd raise the prospect of  
23 settlement or express an interest in resolving either the hiQ or 3taps lawsuits. Nor did he request  
24 that the conversation be maintained confidential in any way.

25 *[remainder of page intentionally blank]*  
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1 I declare under penalty of perjury under the laws of the United States that the foregoing is  
2 true and correct.

3 Executed this 14th day of October, 2022, in Stockholm, Sweden.

4 *Scott Roberts*

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6 SCOTT ROBERTS  
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